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Assistant General Counsel



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August 17, 2015

Marlene H. Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless*, EB Docket No. 14-212,  
File No. EB-13-MD-006

Dear Ms. Dortch:

Attached is Verizon's response to certain of NTCH's supplemental interrogatories in the above-captioned proceeding.<sup>1</sup> Specifically, Verizon is responding to NTCH supplemental interrogatory Number 2 and Number 7, as modified by the Enforcement Bureau's July 24, 2015 letter.<sup>2</sup> Verizon has determined that certain information contained in the attached should be treated as Highly Confidential. Verizon is filing both redacted and public versions of the requested information with the Commission and will provide both versions to NTCH pursuant to the terms of the Protective Order.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Andre J. Lachance".

Andre J. Lachance

cc: Christopher Killion, Chief, Market Disputes Resolution Division  
Rosemary McEnery, Deputy Chief, Market Disputes Resolution Division  
Lisa Boehley

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<sup>1</sup> See Letter from Rosemary McEnery, Deputy Chief, Market Disputes Resolution Division, Enforcement Bureau, FCC, to Donald J. Evans, Fletcher, Heald & Hildreth, P.L.C., and Andre J. Lachance, Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006 (Jul. 24, 2015) ("EB Jul. 24, 2015 Letter").

<sup>2</sup> EB Jul. 24, 2015 Letter at 2-3.

**VERIZON'S RESPONSE TO NTCH'S SUPPLEMENTAL INTERROGATORIES**

1. Describe and quantify the [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] charged to MVNO partners mentioned in Response #3 of VZW's Response to NTCH's Interrogatories ("VZW's Response"). For all MNVO agreements [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL] (Supplemental interrogatory 2)

**RESPONSE:** [BEGIN HIGHLY CONFIDENTIAL] [REDACTED] [END HIGHLY CONFIDENTIAL]

2. For any agreement on which VZW claims to be a Net Payer, note whether this characterization is true for both voice and data independently or only in the aggregate. (Supplemental interrogatory 7)

**RESPONSE:** See attached Exhibit A.

# Exhibit A

### CDMA ONLY Carriers

[illegible]

### CDMA ONLY Carriers

[illegible]

### CDMA Carriers With LTE

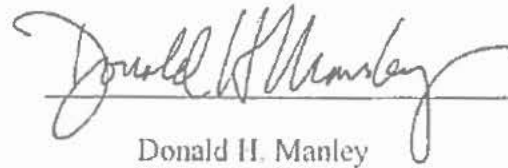
CDMA Carriers With LTE																Total Voice Volumes 1Q 2015								
CARRIER #	LJA	VZW 3G Revenue Rates (Inbound on VZW)					VZW 4G Revenue Rates (Inbound on VZW)				VZW 3G COST RATES (Outbound on Roam Carrier)					VZW 4G Cost Rates (Outbound on Roam Carrier)				VZW Inbound	VZW Outbound	Voice	Data	Total
		Voice Air	Dom Toll	1X DATA	EVDO DATA	SMS	VOLTE AIR per MOU	VOLTE Toll Per Mou	LTE DATA per MB	SMS per MO	Voice Air	Dom Toll	1X DATA	EVDO DATA	SMS	VOLTE AIR per MOU	VOLTE Toll Per Mou	LTE DATA per MB	SMS per MO					
1																								
2																								

GSM Agreements											Total Voice Volumes 1Q 2015					
CARRIER #	LRA	VZW Revenue Rates (Inbound on VZW)					VZW 3G COST RATES (Outbound on Roam Carrier)					VZW Inbound	VZW Outbound	Voice	Data	Total
		Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS - per MT	Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS - per MT	Voice Air MOU	Voice Air MOU	NET PAYER OR NET RECEIVER (based on Total Voice \$) Excl.LRA \$	NET PAYER OR NET RECEIVER (based on Total Data \$) Excl.LRA \$	NET PAYER OR NET RECEIVER (based on Total \$) Excl.LRA \$
1																
2																
3																
4																
5																

# DECLARATION OF DONALD H. MANLEY

1. My name is Donald H. Manley, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless's wholesale and MVNO agreements.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's supplemental interrogatories in NTCH v. Celco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 1.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: August 17, 2015

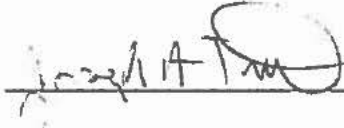
  
Donald H. Manley



### **DECLARATION OF JOSEPH TRENT**

1. My name is Joseph Trent, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless's roaming agreements.
2. The purpose of my declaration is to certify portions of Verizon's response to NTCH's supplemental interrogatories in NTCH v. Celco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the information provided in Response 2.
3. I have reviewed the information provided in Verizon's response to NTCH's Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: August 17, 2015

  
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Joseph Trent

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of August, 2015, copies of the foregoing letter and all attachments thereto were delivered by hand to the following individuals:

Donald J. Evans  
Jonathan R. Markman  
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. 17<sup>th</sup> Street,  
Suite 1100  
Arlington, VA 22209

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/s/  
Sarah E. Trosch